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Plaintiffs' Executive Committee  
c/o Sean Carter, Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103  
SCarter1@cozen.com

**Re: *In re Terrorist Attacks on September 11, 2001*, No. 1:03-md-01570-GBD-FM**

Dear Sean:

We are writing on behalf of Dallah Avco pursuant to Judge Maas's April 9, 2015, order. So far, Dallah Avco has produced 11 volumes of documents relating to Omar al Bayoumi. Those productions primarily derived from various custodians at Dallah Avco's headquarters at Dallah Tower and include the Omar al Bayoumi file that Dallah Avco compiled around late 2002. When its ANSS contracts expired in 2005, however, Dallah Avco sent most of the ANSS files to an offsite storage facility at Dallah City. We understand that, over time, that facility became overrun as various companies began using it as a dumping area for unindexed files, old office furniture, and the like. Those conditions have severely delayed retrieval of the files. Please see the pictures attached as Exhibit A. The known documents remaining to be produced are:

- Dallah Avco has retrieved from the dumping area about 400,000 pages of ANSS project employee files. Omar al Bayoumi's file was located and produced to you in January. Of the rest, we understand that the vendor has scanned 270,000 pages and expects to complete scanning by April 30. We expect to produce English OCR results by May 15 and Arabic OCR results by May 31. So far, we have found only one additional responsive document in the project employee files other than Al Bayoumi's. Reasons for the delay were the time required to locate and retrieve the files from the dumping area, to engage the vendor, and to scan and process the files.
- Dallah Avco's subsequent review of the retrieved files found that they were incomplete and that additional files, specifically general, administrative, and financial ANSS files, remained at Dallah City. Accordingly, Dallah Avco is conducting another search of the dumping area. A further 106 boxes have been retrieved so far and will be manually searched. Our client now states that it hopes to complete production of those files by June.
- Dallah Avco also recently located additional ANSS financial files at Dallah Tower, which appear to be primarily vendor invoices, PCA purchase orders, petty cash receipts, and the like. Those documents had not previously been identified as relevant by the applicable custodian but were identified as a result of further discussions and custodian meetings during undersigned counsel's recent trip to Jeddah. The documents are now being manually searched, and our client states that it hopes to complete production by June.

As we have suggested in the past, if you want access to these documents sooner, our client remains willing to make all these files available for your inspection onsite at any time.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Robert Kry', with a stylized flourish extending from the end.

Robert Kry

cc: Judge Maas and all counsel by ECF

## Exhibit A – Dallah City

